

noted, although laying submarine cable involves considerable activity over vast distances, the environmental consequences are negligible.¹⁵

GRANT OF THE APPLICATION IS IN THE PUBLIC INTEREST

Authorization for the Applicant to land and operate the FLAG Atlantic-1 cable system in the United States will advance the public interest by fostering the availability of a wide range of cost-efficient, international services in the Atlantic region and offering state-of-the-art capacity beyond that offered by competitive trans-Atlantic cable systems. The self-healing ring configuration of the FLAG Atlantic-1 system will increase the reliability of communications between the United States and Europe. The benefits to carriers and end users from the proposed submarine cable system also include increased capacity, route diversity, and restoration, all of which are critical at this time of rapidly increasing demands for trans-Atlantic telecommunications capacity, due largely to the growth in Internet traffic.

The FLAG Atlantic-1 system will also provide increased competition in the provision of undersea telecommunications capacity in the region. Entry by FLAG Atlantic-1 should have the effect of driving down prices in undersea and

¹⁵ See *National Environmental Policy Act*, 49 F.C.C.2d 1313, 1320 (1974); see also *1998 Biennial Regulatory Review – Review of the International Common Carrier Regulations*, Notice of Proposed Rulemaking, FCC 98-188, para. 32 (rel. July 14, 1998) (Commission tentatively concluding that its environmental rules should be amended to provide that the construction of new submarine cables does not have a significant environmental impact).

backhaul markets. FLAG Atlantic is an independent provider of fiber optic telecommunications systems; the proposed FLAG Atlantic-1 system will *not* be jointly constructed, owned, and operated by a consortium, or "club," of dominant international carriers. Grant of this application for a cable landing license would therefore foster the development of multiple, competing facilities-based trans-Atlantic networks. Such increased facilities-based competition among suppliers of trans-Atlantic fiber optic capacity will result in lower prices and increased technical innovation and service quality. FLAG Atlantic's state-of-the-art system will enable small and medium-sized carriers and Internet service providers in the U.S. to access the European, Middle Eastern, and Asian markets without dependence on the traditional "club" cable systems.

The joint venture parties in FLAG Atlantic have extensive experience operating undersea and other telecommunications cables and facilities. FLAG Holdings owns approximately 66 percent of the equity of FLAG Limited, a Bermuda company, which owns and operates an undersea fiber optic cable system serving Europe, the Middle East, and Asia. The FLAG Limited cable system provides high capacity digital services to international carriers, resellers and Internet service providers. GTS is a leading independent owner and operator of telecommunications companies throughout Europe. GTS affiliates provide cross-border transport of, and facilities-based access for, voice, data, Internet and other telecommunications

services in Europe, as well as high quality telecommunications services in Russia and the Commonwealth of Independent States. Headquartered in McLean, Virginia, GTS's affiliates have offices in London, Brussels, Moscow, Budapest, Kiev, Prague and Paris. In addition, certain affiliates of GTS are authorized to provide services between the United States and international points using their own facilities or by reselling international services of existing facilities-based carriers, pursuant to Section 214 authorization granted by the Commission.¹⁶

Finally, the Applicant's ownership is consistent with the public interest. In its *Foreign Participation Order*,¹⁷ the Commission applied its open-entry policies to cable landing license applications proposing to land and operate submarine cables extending between WTO member countries.¹⁸ In doing so, it adopted a presumption that such foreign participation – even if from non-WTO member

¹⁶ The GTS affiliates who are authorized to provide international telecommunications services pursuant to Section 214 authority issued by the Commission are as follows: Hermes Europe Railtel B.V.; Hermes Europe Railtel (Ireland) Ltd.; Hermes Europe Railtel (Network) Ltd.; HER Network Services B.V.B.A.; and Hermes Europe Railtel (US), Inc.

¹⁷ *See Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, Market Entry and Regulation of Foreign-Affiliated Entities, Report and Order and Order on Reconsideration*, 12 FCC Rcd 23891 (1997) ("*Foreign Participation Order*").

¹⁸ *See id.* at 23933, para. 93.

countries – is in the public interest and does not pose concerns that would justify denial of a cable landing license.¹⁹

In short, the Commission's policies restricting foreign ownership in submarine cables apply only to undersea cable systems that propose to land in non-WTO member countries. Consequently, because the Applicant here proposes to land and operate a submarine cable between the United States and the United Kingdom and France, each of which is a WTO member country for which the Commission has an open-entry policy, the proposed submarine cable system raises no foreign ownership concerns that would adversely affect the public interest.

Moreover, the Applicant's affiliation with the foreign carriers listed in Exhibit B hereto does not contravene the public interest. Most of these entities operate in WTO member countries. Further, each of these entities are nascent competitors to the traditional monopoly fixed line service operators and lack the ability to discriminate against unaffiliated U.S. carriers through control of bottleneck facilities. Consequently, the proposed FLAG Atlantic-1 cable poses no threat to trans-Atlantic competition.

Accordingly, the Applicant's foreign ownership does not raise any public interest concerns, and the subject application is consistent with previous

¹⁹ See *id.* at 23913, 23933-34, paras. 50, 93; see also *Telefonica Larga Distancia de Puerto Rico, Inc.*, Modification of Cable Landing License, 13 FCC Rcd 9548, 9551, para. 9 (Int'l Bur. 1998).

Commission decisions where grant of a cable landing license was held to be in the public interest.²⁰

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²⁰ See *SSI Atlantic Crossing*, 13 FCC Red at 5964, para. 11 (no foreign ownership concerns raised and no further analysis required where the ultimate parent was a Bermuda corporation, but substantial majority of shareholders are U.S. citizens and companies); *Optel Telecommunications*, SCL-92-004-TC, DA 98-873 (IB, rel. May 8, 1998) (finding sale of shares in company holding cable landing license to Canadian corporation resulting in licensee being 100% Canadian owned raises no issues under Commission's *Foreign Participation Order*, and is in the public interest).

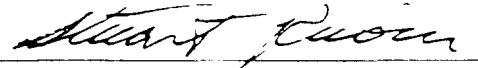
CONCLUSION

For the foregoing reasons, the Applicant respectfully requests, pursuant to 47 U.S.C. §§ 34-39, that a license to land and operate the FLAG Atlantic-1 system in the United States be expeditiously granted.

Respectfully submitted,

FLAG Atlantic Limited

By:



Name: Stuart Rubin

Title: Assistant Secretary, Director

Date: February 25, 1999

By:

Name:

Title:

Date:

CONCLUSION

For the foregoing reasons, the Applicant respectfully requests, pursuant to 47 U.S.C. §§ 34-39, that a license to land and operate the FLAG Atlantic-1 system in the United States be expeditiously granted.

Respectfully submitted,

FLAG Atlantic Limited

By: _____

Name:

Title:

Date:

By: _____

Name: Jan Locher

Title: Director

Date: 12/1/01

EXHIBIT A

FLAG Atlantic-1 Route Sketch

North Shore
of Long Island,
New York

Segment N

Cornwall,
United
Kingdom

Terrestrial
Segment

Segment E

South Shore
of Long Island,
New York

Segment S

Brittany,
France

EXHIBIT B

Information Submitted Pursuant to Section 63.18(h)(1)

GTS has the following foreign carrier affiliations, as defined by the Commission's rules:

Foreign Carrier	Foreign Country	Principal Business
Hermes Europe Railtel BV	Belgium, Denmark, France, Germany, Italy, Spain, Sweden, Switzerland, The Netherlands, United Kingdom, Luxembourg, and Austria ¹	Carrier's Carrier
GTS-Hungary Telecom Ltd.	Hungary	VSAT Network
Hydrotel Telecommunications Ltd.	Hungary	International and Domestic Data Services
Catalina Sp.z o.o.	Poland	International Long Distance Data Communications
ATOM SA	Poland	International and Domestic Data Services
GTS CzechNet s.r.o.	Czech Republic	International Long Distance
GTS CzechCom s.r.o.	Czech Republic	Data and Internet
Sitel-VSAT s.r.o.	Czech Republic	VSAT Network

¹ Hermes Europe Railtel B.V. is in the process of applying for a license in Austria.

Foreign Carrier	Foreign Country	Principal Business
Dattel a.s. ²	Czech Republic	Domestic Public Voice
SG GTS Romania SRL	Romania	VSAT Network
GTS Monaco Access S.A.M.	Monaco	Carriers' Carrier and International Gateway
EDN Sovintel LLC	Russia	International Long Distance and Local Access
Vostok Mobile, B.V. ³	Russia	Basic Cellular
Prim Telephone	Russia	Basic Cellular
Golden Telecom	Ukraine	Basic Cellular and overlay services
TeleCommunications of Moscow	Russia	Local Access

² Dattel a.s. is an unregulated private local network in the Czech Republic which is interconnected to the public switched telephony system in the Czech Republic.

³ Vostok Mobile, B.V. is a wholly owned subsidiary of GTS. Vostok Mobile, B.V. owns between 50% and 100% of a series of cellular ventures in various regions of Russia. The telecommunications companies in which Vostok Mobile, B.V. has interests are Penza Mobile; Astrakhan Mobile; Votec Mobile; Chuvashia Mobile; Lipetsk Mobile; Arkhangelsk Mobile Networks; Saratov Mobile; Volgograd Mobile; Murmansk Mobile Network; Parma Mobile; Unice! Bryansk; Unice! Kostroma; Unice! Orel; Altaisviaz; Unice! Yaroslavl; BashUnice!; Mar Mobile; Novgorod Telecommunications and Unice! Ivanovo.

Foreign Carrier	Foreign Country	Principal Business
TeleRoss LLC ⁴	Russia	Domestic Long Distance
Sovam Teleport, LLC	Russia	Data
Sovam Teleport Kiev Division	Ukraine	Data
C-Datacom International, Inc.	India	International Private Line Communications
GTS Business Services (UK) Ltd.	United Kingdom	Domestic Value Added Services and International Voice
NetSource Europe ASA	Norway	Value Added Services
NetSource Norge AS	Norway	Value Added Services
NetSource Sverige AB	Sweden	Value Added Services
NetSource Danmark SA	Denmark	Value Added Services
NetSource Telecom Benelux BV	Netherlands	Value Added Services
WestCom GmbH	Germany	Value Added Services
International Telecommunications Ltd.	Ireland	Value Added Services

⁴ TeleRoss LLC holds the network license and co-manages fourteen joint ventures. These fourteen joint ventures are TeleRoss-Irkutsk, TeleRoss-Ufa, TeleRoss-Novosibirsk, TeleRoss-Vladivostock, TeleRoss-Tiumen, TeleRoss-Khabarovsk, TeleRoss-Volgograd, TeleRoss-Ekaterinburg, TeleRoss-Nizhni Novgorod, TeleRoss-Arkhangelsk, TeleRoss-Veronezh, TeleRoss-Samara, TeleRoss-Komi and TeleRoss-Kubanelectrosviaz.

Foreign Carrier	Foreign Country	Principal Business
NetSource Phonesystems AB	Sweden	Value Added Services
Atlantic Telecom Venran BV	Netherlands	Value Added Services
Esprit Telecom UK Limited*	United Kingdom	International and National Long Distance
Esprit Telecom UK Limited*	Ireland	Value Added Services
PLUSNET GmbH Co. KG*	Germany	International and National Long Distance
Esprit Telecom France S.A.*	France	International and National Long Distance
Esprit Telecom Ben- elux BV*	Belgium	International and National Long Distance
Esprit Telecom Ben- elux BV*	Netherlands	International and National Long Distance
Esprit Telecom España S.A.*	Spain	International and National Long Distance in Gerona, Madrid, and Barcelona
Esprit Telecom Italia SrL*	Italy	Value Added Services

- This entity will become a foreign carrier affiliation, as defined by the Commission's rules, after consummation of GTS's offer to acquire all the share capital of Esprit Telecom Group plc. See Application of Global TeleSystems Group, Inc. and Esprit Telecom U.K. Limited for authority pursuant to Section 214 of the Communications Act of 1934, as amended, to transfer control of an authorized international carrier, filed January 20, 1999, as amended on February 17, 1999. 4

EXHIBIT C

Information Submitted Pursuant to Section 63.18(h)(2)

The name, address, citizenship and principal business of each of the Applicant's 10% or greater direct shareholders are as follows:

<u>Shareholder Name/Address</u>	<u>% Held in FLAG Atlantic</u>	<u>Citizenship</u>	<u>Principal Business</u>
FLAG Atlantic Holdings Limited The Emporium Building 69 Front Street 4 th Floor Hamilton HM12 Bermuda	50%	Bermuda	Holding Company
GTS TransAtlantic Holdings, Ltd. Clarendon House 2 Church Street Hamilton HM11 Bermuda	50%	Bermuda	Holding Company

FLAG Atlantic Holdings Limited

The name, address, citizenship and principal business of the FLAG Atlantic Holdings Limited ("FAH") direct shareholder that has a 10% or greater indirect interest in the Applicant are as follows:

<u>Shareholder Name/Address</u>	<u>% Held in FAH</u>	<u>Citizenship</u>	<u>Principal Business</u>
FLAG Telecom Holdings Limited The Emporium Building 69 Front Street 4 th Floor Hamilton HM12 Bermuda	100%	Bermuda	Holding Company

FLAG Telecom Holdings Limited

The name, address, citizenship and principal business of each of the FLAG Telecom Holdings Limited ("FLAG Holdings") 10% or greater direct shareholders are set forth below. Note that there are only two direct shareholders of FLAG Holdings that have a 10% or greater indirect interest in the Applicant.

Bell Atlantic Network Systems Co. ("BANS"), a wholly owned indirect subsidiary of Bell Atlantic Corporation, holds a 5.26% direct equity interest in FLAG Holdings and, through its 18.19% interest in Telecom Asia, a 9.9% combined direct and indirect interest in FLAG Holdings (BANS will there-
(continued...)

<u>Shareholder Name Address</u>	<u>% Held in FLAG Holdings</u>	<u>Citizenship</u>	<u>Principal Business</u>
Rathburn Limited ² Abbott Building Main Street P.O. Box 3186 Tortola BVI	32.61%	British Virgin Is- lands	Investment Company

¹ (...continued)

fore have less than a 5% indirect equity interest in the Applicant). BANS also holds a 34.21% equity interest in FLAG Limited, which owns an under-sea fiber optic cable system connecting the U.K. and Japan through several landing points in Europe, the Middle East and Asia. BANS and FLAG Holdings have entered into an agreement pursuant to which BANS will, provided it receives any necessary regulatory approval, including appropriate section 271 authorization (47 U.S.C. § 271) within three years, transfer its 34.21% stock interest in FLAG Limited to FLAG Holdings in exchange for a specified number of shares in FLAG Holdings equal to an additional 32.42% of the shares of FLAG Holdings (assuming no additional FLAG Holdings shares have been issued before such exchange). If effectuated, this exchange of shares will give BANS a 37.68% direct interest in FLAG Holdings (assuming no additional FLAG Holdings shares have been issued before such exchange). Prior to any such exchange, FLAG Holdings and FLAG Atlantic will not be affiliates (as that term is used in section 271 of the Communications Act) of Bell Atlantic or its operating companies. See 47 U.S.C. §153(1).

² The ultimate parent company of Rathburn Limited is Dallah Al Baraka Holding Company B.E.J.S.C., a Bahraini corporation engaged in various businesses and headquartered in Manama, Bahrain

<u>Shareholder Name/Address</u>	<u>% Held in FLAG Holdings</u>	<u>Citizenship</u>	<u>Principal Business</u>
Marubeni Telecom Development Limited ³ Cedar House 41 Cedar Avenue Hamilton HM12 Bermuda	14.52%	Bermuda	Investment Company
The Asian Infrastructure Fund c/o Caledonian Bank & Trust Limited Caledonian House Mary Street Georgetown Grand Cayman Cayman Islands	13%	Cayman Islands	Investment Fund

³ The ultimate parent company of Marubeni Telecom Development Limited is the Marubeni Corporation, a Japanese conglomerate headquartered in Tokyo, Japan that is engaged in various businesses.

<u>Shareholder Name/Address</u>	<u>% Held in FLAG Holdings</u>	<u>Citizenship</u>	<u>Principal Business</u>
K.I.N. (Thailand) Company Limited ⁴ c/o Telecom Holding Co. Ltd. 30 th Floor Telecom Tower 18 Ratchadaphisek Road Huai Khwang Bangkok 10310 Thailand	26.01%	Thailand	Investment Company

GTS TransAtlantic Holdings, Ltd.

The name, address, citizenship and principal business of the GTS TransAtlantic Holdings, Ltd. ("GTS TransAtlantic") direct shareholder that has a 10% or greater indirect interest in the Applicant are as follows.

⁴ The ultimate parent company of K.I.N. (Thailand) Company Limited is Telecom Asia Corporation Public Co. Ltd., a Thailand company located in Bangkok that is principally engaged in fixed line local network operations in Bangkok, cable television operations, and the provision of Internet service.

<u>Shareholder Name/Address</u>	<u>% Held in GTS Trans- Atlantic</u>	<u>Citizenship</u>	<u>Principal Business</u>
GTS TransAtlantic Carrier Services, Ltd. Clarendon House 2 Church Street Hamilton HM11 Bermuda	100%	Bermuda	Holding Company

GTS TransAtlantic Carrier Services, Ltd.

The name, address, citizenship and principal business of the GTS TransAtlantic Carrier Services, Ltd. ("GTS TACS") direct shareholder that has a 10% or greater indirect interest in the Applicant are as follows:

<u>Shareholder Name Address</u>	<u>% Held in GTS TACS</u>	<u>Citizenship</u>	<u>Principal Business</u>
GTS Carrier Services, Inc. 1751 Pinnacle Drive North Tower, 12 th Floor McLean, Virginia 22102	100%	U.S. (Delaware)	Holding Company

GTS Carrier Services, Inc.

The name, address, citizenship and principal business of the GTS Carrier Services, Inc. ("GTS Carrier") direct shareholder that has a 10% or greater indirect interest in the Applicant are as follows:

<u>Shareholder Name/Address</u>	<u>% Held in GTS Carrier</u>	<u>Citizenship</u>	<u>Principal Business</u>
GTS European Telecommunications Corp. 1751 Pinnacle Drive North Tower, 12 th Floor McLean, Virginia 22102	100%	U.S. (Delaware)	Holding Company

GTS European Telecommunications Corp.

The name, address, citizenship and principal business of the GTS European Telecommunications Corp. ("GTS ETC") direct shareholder that has a 10% or greater indirect interest in the Applicant are as follows:

<u>Shareholder Name Address</u>	<u>% Held in GTS ETC</u>	<u>Citizenship</u>	<u>Principal Business</u>
Global TeleSystems Group, Inc. 1751 Pinnacle Drive North Tower, 12 th Floor McLean, Virginia 22102	100%	U.S. (Delaware)	Provider of international telecommunications services

Global TeleSystems Group, Inc.

The name, address, citizenship and principal business of each of the Global TeleSystems Group, Inc. ("GTS") direct shareholders that hold 10% or greater interest in GTS are set forth below. Note that there are no direct shareholders of GTS that have a 10% or greater indirect interest in the Applicant.

<u>Shareholder Name/Address</u>	<u>% Held in GTS</u>	<u>Citizenship</u>	<u>Principal Business</u>
Fidelity Management & Research Corp. 82 Devonshire Street Boston, MA 02109 and Fidelity International Limited Pembroke Hall 42 Crow Lane Hamilton, Bermuda	11.04% * Total: 11.04%	U.S. (Massachusetts) Bermuda	Investment Advisor Investment Advisory and Management Services
Mutuelles AXA AXA-UAP The Equitable Companies Incorporated 9 Place Vendome 75001 Paris FRANCE	14.3%	France	Insurance

⁵ Percent stakes represent holdings of several separately managed funds and are based on filings to the Securities and Exchange Commission.

⁶ *Id.*

* Less than 1%.

The information concerning the direct shareholders of GTS that have certain indirect interests in the Applicant relate to the shares of Common Stock that are beneficially owned prior to the consummation of GTS's offer to acquire all the share capital of Esprit Telecom Group plc. See Application of Global TeleSystems Group, Inc. and Esprit Telecom U.K. Limited for authority pursuant to Section 214 of the Communications Act of 1934, as amended, to transfer control of an authorized international carrier, filed January 20, 1999, as amended on February 17, 1999.

Upon consummation of GTS's offer to acquire all the share capital of Esprit Telecom Group plc, the name, address, citizenship and principal business of the GTS direct shareholders that will hold approximately 10% or greater interest in GTS are set forth below. Note that there will be no direct shareholders of GTS that will have a 10% or greater indirect interest in the Applicant.

<u>Shareholder Name/Address</u>	<u>% Held in GTS</u>	<u>Citizenship</u>	<u>Principal Business</u>
Fidelity Management & Research Corp. 82 Devonshire Street Boston, MA 02109	8.97%	U.S. (Massachusetts)	Investment Advisor
and Fidelity International Limited Pembroke Hall 42 Crow Lane Hamilton, Bermuda	1.42% Total: 10.39%	Bermuda	Investment Advisory and Management Services
Mutuelles AXA/AXA-UAP The Equitable Companies Incorporated 9 Place Vendome 75001 Paris FRANCE	11.25%	France	Insurance

Section 63.18(h)(2) also requires the Applicant to identify any interlocking directorates. Jan Loeber is a director of FLAG Atlantic Limited and of Hermes Europe Railtel B.V.

Id.

Id.

CERTIFICATIONS UNDER FCC RULES 1.2001 - 1.2003

On behalf of FLAG Atlantic Limited, we hereby certify that, with respect to FLAG Atlantic Limited and its principals, no officer or director of FLAG Atlantic Limited is subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

FLAG Atlantic Limited

By: Stuart Rubin
Name: Stuart Rubin
Title: Assistant Secretary Director
Date: February 25, 1999

By: _____
Name:
Title:
Date:

CERTIFICATIONS UNDER FCC RULES 1.2001 - 1.2003

On behalf of FLAG Atlantic Limited, we hereby certify that, with respect to FLAG Atlantic Limited and its principals, no officer or director of FLAG Atlantic Limited is subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

FLAG Atlantic Limited

By: _____

Name: _____

Title: _____

Date: _____

By: _____

Name: Jan Loebber

Title: Director

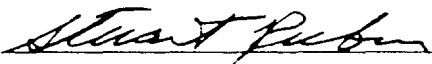
Date: 11/15/19

CERTIFICATIONS UNDER FCC RULES 1.2001 - 1.2003

On behalf of FLAG Atlantic Holdings Limited, I hereby certify that, with respect to FLAG Atlantic Holdings Limited and its principals, no party to the foregoing Application is subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

FLAG Atlantic Holdings Limited

By:



Name: Stuart Rubin

Title: Assistant Secretary

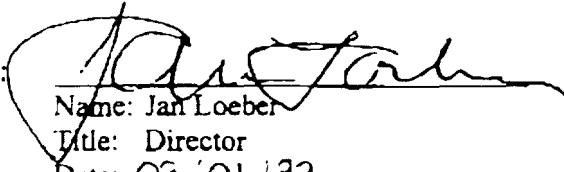
Dated: February 25, 1999

CERTIFICATIONS UNDER FCC RULES 1.2001 - 1.2003

On behalf of GTS TransAtlantic Holdings, Ltd., I hereby certify that, with respect to GTS TransAtlantic Holdings, Ltd. and its principals, no officer or director of GTS TransAtlantic Holdings, Ltd. is subject to a denial of Federal benefits that include FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

GTS TransAtlantic Holdings, Ltd.

By:


Name: Jan Loeber

Title: Director

Date: 03/01/99

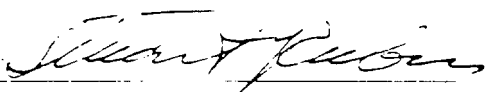
Original signature page will be submitted as soon as possible.

CERTIFICATIONS UNDER FCC RULE 63.18(h)(1)

FLAG Atlantic Limited certifies that, except as set forth herein, it is not affiliated with a foreign carrier, as that term is defined in Section 63.18(h)(1) of the Commission's rules, 47 C.F.R. § 63.18(h)(1). FLAG Atlantic Limited is affiliated, within the meaning of 47 C.F.R. § 63.18(h)(1), with foreign carriers in foreign countries as set forth in Exhibit B to the instant application.

FLAG Atlantic Limited

By:



Name: Stuart Rubin

Title: Assistant Secretary Director

Date: February 18, 1999

By

Name: _____

Title _____

Date: _____

CERTIFICATIONS UNDER FCC RULE 63.18(h)(1)

FLAG Atlantic Limited certifies that, except as set forth herein, it is not affiliated with a foreign carrier, as that term is defined in Section 63.18(h)(1) of the Commission's rules, 47 C.F.R. § 63.18(h)(1). FLAG Atlantic Limited is affiliated, within the meaning of 47 C.F.R. § 63.18(h)(1), with foreign carriers in foreign countries as set forth in Exhibit B to the instant application.

FLAG Atlantic Limited

By: _____

Name: _____

Title: _____

Date: _____

By: _____

Name: Jan Loeber

Title: Director

Date: 10/1/99

CERTIFICATE OF SERVICE

I hereby certify that on this 1 day of March, 1999, a copy of the foregoing Application was served by First Class Mail, postage prepaid, on each of the persons listed on the attached service list.

Carly Belkin

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Commandant of the Marine Corps.
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Washington, D. C. 20380-1775

International Transcription Services, Inc.
Federal Communications Commission
2100 M Street, N.W., Suite 140
Washington, D.C. 20037

* BY HAND